

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

RICHARD FELTZ, ASHTON DENNIS, on behalf of themselves and all other similarly situated,

Plaintiffs,

v.

BOARD OF COUNTY COMMISSIONERS OF THE COUNTY OF TULSA, *et al.*,

Defendants.

Case No. 18-CV-0298-CVE-JFJ

**PLAINTIFFS' MOTION FOR ADDITIONAL PAGES TO RESPOND TO DEFENDANTS'
MOTIONS TO DISMISS**

Pursuant to Local Rule 7-1(d), Plaintiffs respectfully move the Court for leave to file a single, combined brief in excess of 25 pages to jointly respond to two of the Defendants' four motions to dismiss the Second Amended Complaint that were filed by Defendants on March 31, 2021. The length of the proposed filing will not exceed 30 pages, excluding captions and signatures. Defendants do not object to this motion. In support of this motion, Plaintiffs state the following:

1. Local Rule 7-1(d) states that: "Absent leave of Court, opening and response briefs shall be limited to twenty-five typewritten pages, and reply and supplemental briefs shall be limited to ten pages in length. Motions for leave to file a brief in excess of twenty-five typewritten pages shall state the requested number of pages and shall be filed no later than one day prior to the date the brief is due."

2. On March 31, 2021, Defendants filed four motions to dismiss Plaintiffs' Second Amended Complaint, ECF Nos. 269, 270, 272, 273, 275, 277. Motions to dismiss were filed

on behalf of (1) the Special Judges, (2) the Presiding Judge, (3) the Sheriff, and (4) the Board of County Commissioners of the County of Tulsa.

3. Plaintiffs' responses are due May 5, 2021.

4. Plaintiffs plan to file a single, combined brief in opposition to the Special Judges' and Presiding Judge's two separate motions to dismiss. Plaintiffs believe that there is substantial overlap in the issues presented in Special Judges' and Presiding Judge's briefs, and that responding in one consolidated brief would make for more efficient use of the Court's time.

5. Plaintiffs have diligently attempted to stay within the page limit but the fact that Plaintiffs are responding to the two separate motions of two Defendants in one combined opposition brief necessitates a reply in excess of the allotted 25 pages.

6. Plaintiffs' proposed filing will not exceed 30 pages, excluding captions and signatures.

7. Defendants have indicated that they do not object to the motion.

8. For the foregoing reasons, Plaintiffs request that the Court enter an order permitting Plaintiffs to file an opposition brief of up to 30 pages in length, exclusive of captions and signatures.

Dated May 4, 2021

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Attorneys for Plaintiffs

**Admitted to practice pro hac vice*

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of May 2021, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing. I further certify that a true and correct copy of the foregoing document was sent via the Court's ECF System to all registered parties.

/s/ Gary Yeung
Gary Yeung